

On May 12, 2020, representatives of Allocation Phase claimant groups informed the Judges that they had “settled these issues” with regard to 2014 and 2015 satellite royalties, and asked the Judges to affirm the allocation phase category definitions previously set forth elsewhere. In turn, based on such agreement, those parties moved for a lift of stay with regard to the final distribution of such royalties.

As should already be clear from the Judges’ order, the definition of claimant categories is not within the authority of the allocation phase parties to exclusively dictate in these proceedings. Not only do the definitions affect allocation phase participants, but affects parties such as Multigroup Claimants that do not stand as a category representative, or whom have claims in multiple possible categories.¹ Presumably, this is why the Judges did not solicit comments in their March 20, 2019 order only from “allocation phase” participants, but rather solicited briefing from “any party in interest”. Nor did the Judges dismiss Multigroup Claimants’ response to the March 20, 2019 order as having been submitted by an unaffected party, but cited to it in their December 20, 2019 order.

¹ Multigroup Claimants observes that the joint motion was not a submission of all potentially interested parties other than Multigroup Claimants, as it also failed to include stipulation by Global Music Rights, LLC, Major League Soccer, LLC, and Circle God Network LLC, dba David Powell, each of whom submitted petitions to participate in these proceedings.

On the foregoing grounds, Multigroup Claimants opposes the *Joint Notice of Settlement and Motion to Lift Stay* submitted by various allocation phase participants, which should be denied in its entirety.

Respectfully submitted,

Dated: May 26, 2020

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CERTIFICATE OF SERVICE

I hereby certify that on this May 26, 2020, a copy of the foregoing was electronically filed and served on the following parties via the eCRB system.

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Proof of Delivery

I hereby certify that on Tuesday, May 26, 2020, I provided a true and correct copy of the Multigroup Claimants' Opposition To Motion To Lift Stay to the following:

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